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August 10, 2018

Mark W. Ishman  
Ishman Law Firm, P.C.  
9660 Falls of Neuse Road  
Suite 138-350  
Raleigh, NC 27615

Via U.S. Regular Mail and  
Email to: [mishman@ishmanlaw.com](mailto:mishman@ishmanlaw.com)

**Re: Baronius Press, Ltd. V. Saint Benedict Press, LLC**  
**3:16 cv-00695-GCM (USDC – WDNC)**

Dear Mark:

Enclosed are Saint Benedict's updated sales figures broken down by month, as well as by hardcover and paperback as you have requested, bates stamped SBPP-03393 to SBPP-03394 and marked Confidential. As you can see, the sales information dates back to 2008. Although we do not believe that Baronius is entitled to sales or profit information going back that far, nor do we believe that, should Saint Benedict be found to have infringed your client could recover any damages from sales prior to 2014, we have nonetheless provided you with the enclosed as it further shows that our client has continuously exploited the Work and is therefore a reliance party. Although our client can explain the various columns and figures during its deposition, to assist you with providing us with your outstanding damages figures as expeditiously as possible, which we have repeatedly requested, I can tell you that "PB" stands for paperback and "HC" stands for hardcover. "Net units" and "net sales" only represents the total sales, or units sold, minus returns. The "net sales" figures do not take into account any of the expenses that our client is allowed to deduct by law.

As you now have the information you have requested and in the format you have requested it, we expect complete responses to Defendant Saint Benedict Press, LLC's Second Set of Interrogatories and Requests for Production of Documents to Plaintiff Baronius Press, Ltd. by close of business Wednesday, August 15, 2018.

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Mr. Mark Ishman  
August 10, 2018  
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I have received your email requesting a date to meet and confer regarding Defendant's privilege log. It would be more efficient to wait to have the conference until after we have received Plaintiff's complete responses to Defendant's Second Set of Discovery Requests so that any remaining deficiencies in your client's responses can be addressed at the same time.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan E. Buchan", with a long horizontal flourish extending to the right.

Jonathan E. Buchan  
Natalie D. Potter

NDP/hmb  
Enclosure

cc: Kristin G. Garris (via email only to: [garris@thsh.com](mailto:garris@thsh.com))



# Fundamentals NET Sales History

Line	YEAR	System	Month	PB SKU	PB Units BO	PB Net Units	PB Net Sales	HA	HC SKU	HC Units BO	HC Net Units	HC Net Sales
1	2008	MAS	Jan	0155					2350			
2	2008	MAS	Feb	0155					2350			
3	2008	MAS	Mar	0155					2350			
4	2008	MAS	Apr	0155					2350			
5	2008	MAS	May	0155					2350			
6	2008	MAS	Jun	0155					2350			
7	2008	MAS	Jul	0155					2350			
8	2008	MAS	Aug	0155					2350			
9	2008	MAS	Sep	0155					2350			
10	2008	MAS	Oct	0155					2350			
11	2008	MAS	Nov	0155					2350			
12	2008	MAS	Dec	0155					2350			
13												
14	2009	MAS	Jan	0155					2350			
15	2009	MAS	Feb	0155					2350			
16	2009	MAS	Mar	0155					2350			
17	2009	MAS	Apr	0155					2350			
18	2009	MAS	May	0155					2350			
19	2009	MAS	Jun	0155					2350			
20	2009	MAS	Jul	0155					2350			
21	2009	MAS	Aug	0155					2350			
22	2009	MAS	Sep	0155					2350			
23	2009	MAS	Oct	0155					2350			
24	2009	MAS	Nov	0155					2350			
25	2009	MAS	Dec	0155					2350			
26												
27	2010	MAS	Jan	0155					2350			
28	2010	MAS	Feb	0155					2350			
29	2010	MAS	Mar	0155					2350			
30	2010	MAS	Apr	0155					2350			
31	2010	MAS	May	0155					2350			
32	2010	MAS	Jun	0155					2350			
33	2010	MAS	Jul	0155					2350			
34	2010	MAS	Aug	0155					2350			
35	2010	MAS	Sep	0155					2350			
36	2010	MAS	Oct	0155					2350			
37	2010	MAS	Nov	0155					2350			
38	2010	MAS	Dec	0155					2350			
39												
40	2011	MAS	Jan	0155					2350			
41	2011	MAS	Feb	0155					2350			
42	2011	MAS	Mar	0155					2350			
43	2011	MAS	Apr	0155					2350			
44	2011	MAS	May	0155					2350			
45	2011	MAS	Jun	0155					2350			
46	2011	MAS	Jul	0155					2350			
47	2011	MAS	Aug	0155					2350			
48	2011	MAS	Sep	0155					2350			
49	2011	MAS	Oct	0155					2350			
50	2011	MAS	Nov	0155					2350			
51	2011	MAS	Dec	0155					2350			
52												
53	2012	MAS	Jan	0155					2350			
54	2012	MAS	Feb	0155					2350			
55	2012	MAS	Mar	0155					2350			
56	2012	MAS	Apr	0155					2350			
57	2012	MAS	May	0155					2350			
58	2012	MAS	Jun	0155					2350			
59	2012	MAS	Jul	0155					2350			
60	2012	MAS	Aug	0155					2350			
61	2012	MAS	Sep	0155					2350			
62	2012	MAS	Oct	0155					2350			
63	2012	MAS	Nov	0155					2350			
64	2012	MAS	Dec	0155					2350			
65												
66	2013	MAS	Jan	0155					2350			
67	2013	MAS	Feb	0155					2350			
68	2013	MAS	Mar	0155					2350			
69	2013	MAS	Apr	0155					2350			
70	2013	MAS	May	0155					2350			
71	2013	MAS	Jun	0155					2350			
72	2013	MAS	Jul	0155					2350			
73	2013	MAS	Aug	0155					2350			
74	2013	MAS	Sep	0155					2350			
75	2013	MAS	Oct	0155					2350			
76	2013	MAS	Nov	0155					2350			
77	2013	MAS	Dec	0155					2350			
78												
79	2014	MAS	Jan	0155					2350			
80	2014	MAS	Feb	0155					2350			
81	2014	Acumen	Mar	0155					2350			



Line	YEAR	System	Month	PB SKU	PB Units BO	PB Net Units	PB Net Sales	**	HC SKU	HC Units BO	HC Net Units	HC Net Sales
82	2014	Acumen	Apr	0155					2350			
83	2014	Acumen	May	0155					2350			
84	2014	Acumen	Jun	0155					2350			
85	2014	Acumen	Jul	0155					2350			
86	2014	Acumen	Aug	0155					2350			
87	2014	Acumen	Sep	0155					2350			
88	2014	Acumen	Oct	0155					2350			
89	2014	Acumen	Nov	0155					2350			
90	2014	Acumen	Dec	0155					2350			
91												
92	2015	Acumen	Jan	0155					2350			
93	2015	Acumen	Feb	0155					2350			
94	2015	Acumen	Mar	0155					2350			
95	2015	Acumen	Apr	0155					2350			
96	2015	Acumen	May	0155					2350			
97	2015	Acumen	Jun	0155					2350			
98	2015	Acumen	Jul	0155					2350			
99	2015	Acumen	Aug	0155					2350			
100	2015	Acumen	Sep	0155					2350			
101	2015	Acumen	Oct	0155					2350			
102	2015	Acumen	Nov	0155					2350			
103	2015	Acumen	Dec	0155					2350			
104												
105	2016	Acumen	Jan	0155					2350			
106	2016	Acumen	Feb	0155					2350			
107	2016	Acumen	Mar	0155					2350			
108	2016	Acumen	Apr	0155					2350			
109	2016	Acumen	May	0155					2350			
110	2016	Acumen	Jun	0155					2350			
111	2016	Acumen	Jul	0155					2350			
112	2016	Acumen	Aug	0155					2350			
113	2016	Acumen	Sep	0155					2350			
114	2016	Acumen	Oct	0155					2350			
115	2016	Acumen	Nov	0155					2350			
116	2016	Acumen	Dec	0155					2350			
117												
118	2017	Acumen	Jan	0155					2350			
119	2017	Acumen	Feb	0155					2350			
120	2017	Acumen	Mar	0155					2350			
121	2017	Acumen	Apr	0155					2350			
122	2017	Acumen	May	0155					2350			
123	2017	Acumen	Jun	0155					2350			
124	2017	Acumen	Jul	0155					2350			
125	2017	Acumen	Aug	0155					2350			
126	2017	Acumen	Sep	0155					2350			
127	2017	Acumen	Oct	0155					2350			
128	2017	Acumen	Nov	0155					2350			
129	2017	Acumen	Dec	0155					2350			
130												
131	2018	Acumen	Jan	0155					2350			
132	2018	Acumen	Feb	0155					2350			
133	2018	Acumen	Mar	0155					2350			
134	2018	Acumen	Apr	0155					2350			
135	2018	Acumen	May	0155					2350			
136	2018	Acumen	Jun	0155					2350			
137	2018	Acumen	Jul	0155					2350			
138	2018	Acumen	Aug	0155					2350			
139	2018	Acumen	Sep	0155					2350			
140	2018	Acumen	Oct	0155					2350			
141	2018	Acumen	Nov	0155					2350			
142	2018	Acumen	Dec	0155					2350			
143				Total					total			